

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
BIG STONE GAP DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>CASE NO 2:19CR00006</b>
	)	
<b>SAMMY CURTIS MCMAHAN, et al</b>	)	
	)	
<b>Defendant.</b>	)	

**MOTION TO CONTINUE PRETRIAL  
CONFERENCE AND TRIAL DATES AND TO  
WITHDRAW AS COUNSEL**

**COMES NOW** counsel for the defendant, Sammy Curtis McMahan, and moves this Court for an Order of continuance of the pretrial conference and trial dates and for an Order allowing his withdrawal as counsel of record for the defendant and for the appointment of new counsel, stating the following as and for his grounds:

1. The trial calendar and personal schedule of the undersigned counsel has been particularly straining over the past month. Counsel has, additionally, been involved in a contested election that has taken much of his free time and has further had to cover the caseload for an associate attorney who left the firm with little notice. As a result, he has been unable to adequately meet to prepare Mr. McMahan for trial.

2. Counsel has been noticed to appear before the Virginia Supreme Court on December 3, 2019, regarding a longstanding appeal. December 3<sup>rd</sup> is the scheduled start date for the trial of this matter.

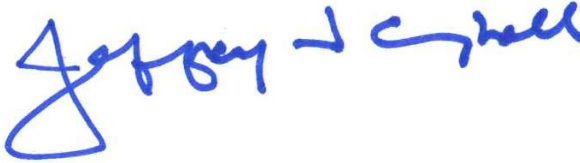
3. The failure to have adequate time during the past four weeks to meet with Mr. McMahan has caused strain upon the attorney-client relationship to the extent that it impairs the ability of counsel to continue in the relationship.

4. As a result of the aforesaid, your counsel believes it would be in the best interests of Mr. McMahan for his withdrawal and for the appointment of new counsel.

WHEREFORE, your undersigned counsel hereby moves the Court for a continuance of the pretrial conference and trial dates and to withdraw as counsel for the defendant.

SAMMY CURTIS MCMAHAN  
- BY COUNSEL -

/s/



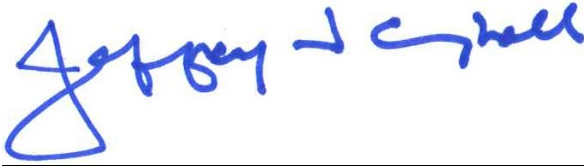
---

**JEFFREY L. CAMPBELL**  
**Virginia Bar Number: 45247**  
**CAMPBELL LAW FIRM, P.C.**  
**709 N. Main Street**  
**Post Office Box 986**  
**Marion, Virginia 24354**  
**Telephone No.: (276) 7783-8197**  
**Facsimile No.: (276) 783-8198**  
**E-mail: [jeff@campbelllawfirmva.com](mailto:jeff@campbelllawfirmva.com)**

**CERTIFICATE OF SERVICE**

I, Jeffrey L. Campbell, Counsel for Defendant, Sammy Curtis McMahan, do hereby certify that I electronically filed the Defendant's Motion for Discovery with the Clerk of the Court using the CM/ECF system which will send notification of such filing to Lena Lockridge Busscher, Assistant United States Attorney for the Western District of Virginia by electronic mailing to [USAVAW.ECFAbingdon@usdoj.gov](mailto:USAVAW.ECFAbingdon@usdoj.gov) and to all other counsel of record on this 14<sup>th</sup> day of November, 2019.

/s/



---

**JEFFREY L. CAMPBELL**  
**Virginia Bar Number: 45247**  
**CAMPBELL LAW FIRM, P.C.**  
**709 N. Main Street**  
**Post Office Box 986**  
**Marion, Virginia 24354**  
**Telephone No.: (276) 7783-8197**  
**Facsimile No.: (276) 783-8198**  
**E-mail: [jeff@campbelllawfirmva.com](mailto:jeff@campbelllawfirmva.com)**